

EXHIBIT 1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

**ORDER APPROVING JOINT STIPULATION EXTENDING TIME TO RESPOND TO
FIRST AMENDED COMPLAINT**

Upon consideration of the *Joint Stipulation Extending Time to Respond to First Amended Complaint*, a copy of which is attached hereto as **Exhibit A** (the “Stipulation”), and after due deliberation and sufficient cause appearing therefore, it is hereby:

ORDERED that the Stipulation and the terms set forth therein are APPROVED and shall have the full force and effect of an order entered by the Court with respect thereto; and it is further;

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

ORDERED that entry of this Order and approval of the Stipulation is without prejudice to an application for, or stipulation to, a further extension of the response deadlines set forth in the Stipulation; and it is

ORDERED that this Court retains jurisdiction to interpret, implement and enforce the provisions of this Order and the Stipulation.

EXHIBIT A TO ORDER

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§ Chapter 11 Case
Old LC, Inc., et al. ¹	§ Case No. 19-11791 (BLS)
Debtors.	§ Jointly Administered

Official Committee of Unsecured Creditors
of Old LC, Inc., et al., for and on behalf of
the estates of Old LC, Inc., et al.; §
§
§

Plaintiff,

v. § Adv. No. 20-51002 (BLS)

Upfront V, LP, Breakwater Credit Opportunities Fund, L.P.; Upfront GP V, LLC; Mark Suster; Dana Kibler; Gregory Bettinelli; Saif Mansour; Aamir Amdani; Eric Beckman; Darrick Geant; and Joseph Kaczorowski

Defendants.

**JOINT STIPULATION EXTENDING TIME TO RESPOND TO
FIRST AMENDED COMPLAINT**

Plaintiff Official Committee of Unsecured Creditors (the “*Plaintiff*” or “*Committee*”) of Old LC, Inc.; Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. (collectively, “*Loot Crate*” or the “*Debtors*”), and Defendants Upfront V, LP, Breakwater Credit Opportunities Fund, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler, Gregory Bettinelli, Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski (collectively, the

¹ The Debtors are the following four entities (the last four digits of their respective taxpayer identification numbers, if any, follow in parentheses): Old LC, Inc. (7119), Old LC Holdings, Inc., Old LCF, Inc., and Old LC Parent, Inc. The Debtors' noticing address in these Chapter 11 cases is c/o Bryan Cave Leighton Paisner LLP, Attn: Mark I. Duedall, 1201 W. Peachtree Street, 14th Floor, Atlanta, Georgia 30309.

“**Defendants**,” and collectively with the Committee, the “**Parties**”) file this *Joint Stipulation Extending Time to Answer*, and hereby stipulate and agree as follows:

1. The Committee filed its *Complaint and Objection to Claims* (the “**Complaint**”) on November 2, 2020 [D.I. 1].

2. On November 24, 2020, the Court entered the *Order Approving Scheduling Order* [D.I. 19] that, among other things, set January 15, 2021 as the deadline for the Defendants to answer and/or otherwise respond to the Complaint.

3. On January 15, 2021, defendants Upfront V, L.P., Upfront GP V, LLC, Mark Suster, Dana Kibler and Gregory Bettinelli (collectively, the “**Upfront Defendants**”) filed their *Motion to Dismiss* [D.I. 24].

4. On January 15, 2021, defendants Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski (collectively, the “**Breakwater Defendants**”) filed their *Answer and Specific Defenses* [D.I. 25].

5. On February 5, 2021, Plaintiff filed the *First Amended Complaint and Objection to Claims* [D.I. 28] (the “**First Amended Complaint**”).

6. The Parties agree that the Upfront Defendants’ Motion to Dismiss [D.I. 24] is now moot in light of the First Amended Complaint.

7. The Parties agree that the time within which Defendants may answer, move, or otherwise plead to the First Amended Complaint in the above-referenced adversary proceeding is hereby extended to and including **March 5, 2021**, with Defendants reserving all available rights, remedies and defenses.

8. If Defendants file one or more motions pursuant to Fed. R. Bankr. P. 7012 and/or Fed. R. Civ. P. 12, the Plaintiff shall file any opposition to the motions on or before **March 26, 2021.**

9. If applicable, Defendants shall file any reply in support of any motions on or before **April 9, 2021.**

9.10. This stipulation is without prejudice to an application for, or stipulation to, a further extension of the response deadlines set forth herein. Any other deadlines not affected by this Stipulation remain unchanged.

Dated: February _____, 19, 2021
Wilmington, Delaware

Respectfully submitted,

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman
Jeffrey R. Waxman (DE Bar No. 4159)
Eric J. Monzo (DE Bar No. 5214)
Brya M. Keilson (DE Bar No. 4643)
500 Delaware Avenue, Suite 1500
Wilmington, DE 19801
Telephone: (302) 888-6800
Facsimile: (302) 571-1750
E-mail: jwaxman@morrisjames.com
E-mail: emonzo@morrisjames.com
E-mail: bkeilson@morrisjames.com

- and -

Joel B. Bailey, Esquire
Joshua L. Hedrick, Esquire
HEDRICK KRING, PLLC
1700 Pacific Avenue, Suite 4650
Dallas, Texas 75201
Telephone: (214) 880-9625
Facsimile: (214) 481-1844

E-mail: Josh@HedrickKring.com
E-mail: Joel@HedrickKring.com

- and -

Samuel M. Stricklin, Esquire
STRICKLIN LAW FIRM, P.C.
Palisade Central II
2435 North Central Expressway
Suite 1200
Richardson, Texas 75080
Telephone 972-2388687
E-mail: Sam.stricklin@stricklaw.pro

Counsel for Plaintiff

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jody C.
Barillare

Formatted: Font: Not Italic

Jody C. Barillare (#5107)
1201 N. Market Street, Suite 2201
Wilmington, Delaware 19801
Telephone: (302) 574-7294
Email: jody.barillare@morganlewis.com

Sabin Willett (*pro hac vice pending*)
One Federal Street
Boston, MA 02110-1726
Tel: (617) 951-8775
sabin.willett@morganlewis.com

Shannon B. Wolf (*pro hac vice pending*)
One State Street
Hartford, CT 06103-3178
Tel. (860) 240-2700
Fax: (860) 240-2701
shannon.wolf@morganlewis.com

Counsel for Defendants Breakwater Credit Opportunities Fund, L.P., Saif Mansour, Aamir Amdani, Eric Beckman, Darrick Geant, and Joseph Kaczorowski

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Colin R. Robinson

Dean A. Ziehl (CA Bar No. 84529)
James K.T. Hunter (CA Bar No. 73369)
Colin R. Robinson (DE Bar No. 5524)
919 North Market Street, 17th Floor
Wilmington, DE 19801
Telephone: (302) 652-4400
Facsimile: (302) 652-4400
E-mail: dziehl@pszjlaw.com
E-mail: crobinson@pszjlaw.com

*Counsel for Defendants Upfront V, LP, Upfront GP V,
LLC, Mark Suster, Dana Kibler, and Gregory Bettinelli*